

**Exhibit A – Joint Claim Construction Statement**

Non-means-plus-function terms								
No.	Term	Patent No./Claims	Intus IQ's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
1.	server controller	'062, Claim 2	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “one or more processors, such as microprocessors, used by a server”	Col. 5, ll. 7-14; Fig. 3; Col. 12, l. 43 – Col. 13, l. 8; Col. 13, ll. 9-19		A processor of the server that is separate from the CPU of the server and that executes a server process.	Abstract; Col. 5, ll. 8-24; Figs. 1, 3, 4, 8-10, 13 and associated descriptions	
2.	client controller	'062, Claim 2	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “one or more processors, such as microprocessors, used by a client”	Col. 5, l. 11; Col. 8, ll. 8-13, ll. 34-42; Col. 19, ll. 14-16		A processor of a client that is separate from the CPU of the client and that executes a client process.	Abstract; Col. 5, ll. 8-24; Figs. 1, 3, 4, 8-10, 13 and associated descriptions	
3.	a server process	'062, Claims 2, 3, 4, 6, 7, 8, 10, 11, 12, 14, 15, 16	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “a process that can be implemented by a server”	Figs. 4-11 and related discussion		A program that is executed by the server.	Abstract; Col. 5, ll. 8-24; Col. 8, ll. 35-42; Col. 13, ll. 9-54; Col. 17, ll. 22-34; Col. 22, ll. 46-67; Figs. 1, 4-6, 9-11, 14-20 and associated descriptions	
4.	a client process	'062, Claims 2, 6, 10, 14,	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “a process that can be implemented by a client”	Figs. 14-20 and related discussion		A program that is executed by each client.	Abstract; Col. 5, ll. 8-38; Col. 8, ll. 35-42; Col. 18, ll. 17-22; Col. 18, l. 66- Col. 19, l. 44; Col. 19, l. 63-Col. 20, l. 23; Figs. 1, 4-6, 9-11, 14-20 and associated	

**Exhibit A – Joint Claim Construction Statement**

Non-means-plus-function terms								
No.	Term	Patent No./Claims	Intus IQ's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
							descriptions	
5.	direct link	'062, Claims 2, 6, 10, 14	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “a route from one node to another node with no intervening node”	Abstract; Col. 4, l. 55 – Col. 5, l. 7; Col. 10, ll. 11-13; Claims 2, 6, 10, 14		A transmission path from a client to the server that does not include intermediate devices.	Abstract; Col. 4, l. 55-Col. 5, l. 38; Col. 5, l. 64- Col. 6, l. 6; Col. 8, ll. 42-64, Col. 9, ll. 50-57; Figs. 1, 2, 8, 9 and associated descriptions	
6.	indirect link	'062, Claims 2, 6, 10, 14	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “a route from one node to another node through one or more additional nodes”	Abstract; Col. 4, l. 55 – Col. 5, l. 7; Col. 10, ll. 11-13; Claims 2, 6, 10, 14		A transmission path from a client to the server that includes one or more intermediate devices.	Abstract; Col. 4, l. 55-Col. 5, l. 38; Col. 5, l. 64- Col. 6, l. 6; Figs. 1, 2, 8, 9 and associated descriptions	
7.	said client process of each of said clients initiates and selects a radio transmission path to said server	'062, Claim 2	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “said client process of each of said clients identifies and selects a radio transmission path to said server”	Col. 5, ll. 16-19; Figs. 2a-2o, 14 and 20 and related discussion		The client process of each client determines all possible radio transmission paths from that client to the server and controls the decision of which radio transmission path to the server that client will use.	Abstract; Col. 4, l. 40 - Col. 5, l. 38; Col. 8, ll. 43-64; Col. 9, l. 50- Col. 10, l. 52; Col. 11, ll. 18-29; Col. 21, ll. 4-46; Figs. 1, 2 5, 15, 18, 20, 26 and associated descriptions	
8.	client link tree [having client link entries]	'062, Claims 2, 3, 4, 6, 7, 8, 10, 11, 12, 14, 15, 16	Does not require construction – entitled to plain & ordinary meaning.	Figs. 1a, 1b and related discussion		A data structure that stores, for	Col. 9, ll. 45-58; Col. 13, ll. 27-54; Col.	

**Exhibit A – Joint Claim Construction Statement**

Non-means-plus-function terms								
No.	Term	Patent No./Claims	Intus IQ's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
			Alternatively, “data structure relating to links among or between clients and/or one or more servers”			each client, only the most recent transmission path to the server selected by that client.	14, ll. 35-64; Col. 15, ll. 34-43; Col. 16, l. 26, Col. 17, l. 5; Col. 21, ll. 28-46; Col. 22, ll. 12-67; Figs. 1, 2, 5, 6, 8, 9, 11, 19 and associated descriptions	
9.	[logic that] determine[es/ing] if said client is authentic	'062, Claims 4, 12, 16	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “logic that determines whether said client is authorized to access the network”	Col. 15, ll. 14-17		Security check to determine if the client is authorized to access the server.	Col. 14, ll. 52-64; Col. 22, ll. 1-9; Figs. 6, 19 and associated descriptions	
10.	housekeeping [functions/step ]	'062, Claims 6, 10, 14	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “functions/steps designed to keep the network in good working order”	Fig. 11 and related discussion; Col. 16, ll. 61-62.	Microsoft dictionary (housekeeping: any of various routines, such as updating the clock or performing garbage collection, designed to keep the system, the environment within which a program runs, or the data structures within a program in good working	Deleting clients from the client link tree that have not communicated with the server for a predetermined time period.	Abstract; Col. 5, ll. 25-38; Col. 13, ll. 20-27; Col. 16, l. 50-Col. 17, l. 5; Col. 34-61; Figs. 4, 8, 9, 11 and associated descriptions	

**Exhibit A – Joint Claim Construction Statement**

Non-means-plus-function terms								
No.	Term	Patent No./Claims	Intus IQ's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
11.	gateway	'516, Claims 1, 6, 10, 15, 16, 17, 18, 19	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “an equipment, program, and/or device that facilitates communication between two networks”	'516 Patent: Col. 5, ll. 50-52; Col. 7, ll. 64-66; Col. 17, ll. 27-30; Claim 15	order)	Equipment, program, or device that connects a network of one protocol type to a network of a different protocol type.	Col. 2, ll. 4-20; Col. 5, l. 35 – Col. 6, l. 8; Col. 7, l. 62- Col. 8, l. 16, Col. 11, ll. 14-27; Col. 17, ll. 14-29; Figs. 1, 3, 8-10, 12, 13 and associated descriptions	
12.	digital controller	'516, Claims 1, 4, 5, 15	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “an equipment, program, and/or device that facilitates transmission of digital data.”	'516 Patent: Col. 5, ll. 61-66		A processor of the server/gateway that is separate from the CPU of the server/gateway.	Abstract; Col. 5, ll. 19-34; Col. 5, l. 50- Col. 6, l. 16; Col. 8, ll. 43-50; Col. 19, ll. 43-53; Figs. 1, 13, 15 and associated descriptions	
13.	data packet	'516, Claims 1, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 18	Does not require construction – entitled to plain & ordinary meaning.	Col. 4, ll. 46-54; Fig. 5a and related discussion; Col. 8, ll. 1-4; Col. 14, ll. 16-19		An associated string of digital information that is transferred and processed as a unit.	Col. 2, ll. 21-65; Col. 3, l. 10 – Col. 4, l. 65; Col. 8, ll. 51-65; Col. 10, l. 32- Col. 11, l. 13; Col. 13, l. 36 – Col. 14, l. 49; Col. 19, l. 54-Col. 20, l. 5; Col. 20, l. 60-Col. 23, l. 9; Figs. 2, 4, 5, 12, 14, 15, 18 and associated descriptions	

**Exhibit A – Joint Claim Construction Statement**

Non-means-plus-function terms								
No.	Term	Patent No./Claims	Intus IQ's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
14.	map of [data packet] transmission paths [of a plurality of clients of said first network/of the wireless network/of the first network]	'516, Claims 1, 13, 14, 15, 19	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “map of data packet transmission paths” should be construed to mean: “data structure containing a representation of one or more transmission paths”	'516 Patent: Col. 5, l. 30; Claim 1; Figures 9a, 9b		A data structure that stores, for each client, only the most recent transmission path to the server/gateway selected by that client.	Col. 5, l. 50-Col. 6, l. 8; Figs. 1, 2, 6, 7, 8, 9 and associated descriptions	
15.	optimize [the transmission paths]	'516, Claims 1, 6, 10, 14, 15, 19	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “optimize the transmission paths” should be construed to mean: “improve the transmission paths”	'516 Patent: Col. 5, ll. 11-18, 45-49; Col. 9, ll. 6-24; Col. 21, ll. 33-36		Improve the efficiency of.	Col. 9, ll. 5-24; Figs. 1, 18 and associated descriptions	
16.	a header	'516, Claims 5, 6, 8, 9, 10, 12, 17	Does not require construction – entitled to plain & ordinary meaning. Alternatively, “a portion of a packet containing information that may include routing information”	'516 Patent: Col. 14, ll. 26-28; Col. 21, ll. 36-38		A data field at the start of a data packet that contains the source address, the address of all hops along the way (i.e., the “link” of the data packet), and the destination address.	Col. 14, ll. 33-43; Col. 15, ll. 53-60; Col. 21, ll. 12-20; Col. 22, l. 56-Col. 23, l. 9; Figs. 5, 6, 15, 17, 18, 21 and associated descriptions	

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
1.	[a wireless network system comprising] server means providing a server process including receiving data packets via a server wireless communication means, sending data packets via said wireless communication means, communicating with a network, and performing housekeeping functions	'062, Claim 6	<p>“server means...” not a means plus function limitation; sufficient structure disclosed in claim.</p> <p>Alternatively, if the Court deems this a means-plus-function limitation:</p> <p>Function: receiving data packets via a server wireless communication means, sending data packets via said wireless communication means, communicating with a network, and performing housekeeping functions</p> <p>Structure: a radio modem, a router or bridge, and one or more processors, such as a microprocessor.</p>	Figs. 3-11, and related discussion; Col. 5. ll. 24-63		<p><u>Function:</u> providing a server process including receiving data packets via a server wireless communication means, sending data packets via said wireless communication means, communicating with a network, and performing housekeeping functions.</p> <p><u>Structure:</u> The hardware and software described in FIGS. 3-11 and col. 12, l. 43 to col. 18, l. 5 of the specification.</p>	Col. 12, l. 43 - Col. 18, l. 5; Figs. 3-11 and associated descriptions	
2.	[a wireless network system comprising] client means providing a client process including sending and receiving data packet via a client wireless communication means, maintaining a send/receive data buffer in digital memory, and	'062, Claim 6	<p>“client means...” not a means plus function limitation; sufficient structure disclosed in claim</p> <p>Alternatively, if the Court deems this a means-plus-function limitation:</p> <p>Function: sending and receiving data packet via a client wireless communication means, maintaining a send/receive</p>	Figs. 3-11, and related discussion; Col. 5. ll. 24-63		<p><u>Function:</u> providing a client process including sending and receiving data packet via a client wireless communication means, maintaining a send/receive data buffer in digital memory, and selecting a link to said server means</p>	Col. 18, l. 66 - Col. 22, l. 27; Figs. 13-19 and associated descriptions	

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
	selecting a link to said server means that is one of a direct link to said server and an indirect link to said server through at least one of the remainder of said plurality of client means		<p>data buffer in digital memory, and selecting a link to said server means that is one of a direct link to said server and an indirect link to said server through at least one of the remainder of said plurality of client means</p> <p><u>Structure:</u> a radio modem, digital memory, and one or more processors, such as a microprocessor.</p>			<p>that is one of a direct link to said server and an indirect link to said server through at least one of the remainder of said plurality of client means</p> <p><u>Structure:</u> The hardware and software described in FIGS. 13-19 and col. 18, l. 66 to col. 22, l. 27 of the specification.</p>		
3.	[wherein said server process further comprises a] means for maintaining a client link tree having client link entries	'062, Claim 6	<p><u>Function:</u> maintaining a client link tree having client link entries</p> <p><u>Structure:</u> a digital controller configured with logic for performing the recited function, which may include logic for storing a client link tree in memory, and its equivalents</p>	<p>Fig. 3, Fig. 5, element 88</p> <p>Col. 5, ll. 55-58</p> <p>Col. 9, ll. 47-49</p> <p>Col. 12, ll. 50-56</p> <p>Col. 13, l. 33-34</p>		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
4.	[wherein said server process further comprises a] means for comparing a selected link from said client to said server to a current client link entry in said client link tree	'062, Claim 7	<p><u>Function:</u> comparing a selected link from said client to said server to a current client link entry in said client link tree</p> <p><u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may</p>	<p>Fig. 5, decision step 88; Col. 13, ll. 31-34</p>		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
			include logic for performing a comparison between the selected link from said client to said server and a link currently in a client link tree, and its equivalents			the specified function.		
5.	[wherein said server process further comprises a] means for updating said client link tree when said comparison meets predetermined conditions	'062, Claim 7	<u>Function:</u> updating said client link tree when said comparison meets predetermined conditions <u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for changing said client link tree to include the selected link from said client to said server when the selected link from said client to said server is different from the current client link entry in said client link tree, and its equivalents	Fig. 5, element 90 Col. 13, ll. 33-34		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
6.	[wherein said server process further includes a] means for determining if said client is authentic	'062, Claim 8	<u>Function:</u> determining if said client is authentic <u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for performing authentication techniques using one-way functions based on chosen seeds, and its equivalents	Figs. 6, 6a, decision step 142 Col. 14, ll. 52-55; Col. 15, ll. 5-33		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
7.	[wherein said server process further includes a] means for determining if said client is already in said client link tree if client is determined to be authentic	'062, Claim 8	<u>Function:</u> determining if said client is already in said client link tree if client is determined to be authentic <u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for searching said client link tree for said client, and its equivalents	Figs. 6, decision step 144  Col. 14, ll. 57-60 Col. 16, l. 50 – Col. 17, l. 5		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
8.	[wherein said server process further includes a] means for deleting said client from said client link tree if said client is already in said client link tree	'062, Claim 8	<u>Function:</u> deleting said client from said client link tree if said client is already in said client link tree <u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for locating said client in said client link tree, deleting said client, and updating sibling pointers that were associated with said client, and its equivalents	Fig. 6, elements 146, 136; Figs. 8, 8a, 8b, 8c  Col. 14, ll. 59-61 Col. 16, ll. 13-35		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
9.	[wherein said server process further includes a] means for inserting said client in said client link tree if said client is authentic	'062, Claim 8	<u>Function:</u> inserting said client in said client link tree if said client is authentic <u>Structure:</u> a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for determining the proper location in the client link tree for said client	Fig. 6, element 140; Fig. 6b  Figs. 7, 7a, 7b Col. 14, ll. 62-64 Col. 15, ll. 34-44 Col. 15, l. 53 – Col. 16, l. 12		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
			and evoking a function ADDSON to add said client to said client link tree, and its equivalents			the specified function.		
10.	[a server comprising] means for receiving a data packet from a client of said wireless network	'516, Claim 6	<u>Function</u> : receiving a data packet from a client of said wireless network <u>Structure</u> : a radio modem and its equivalents	Col. 5, ll. 23-26, 40-43, 54-58; Col. 17, ll. 15-42; Col. 18, ll. 32-34; Cols. 7, 8, 9, and 18; Figures 3 and 12 and related description		<u>Function</u> : receiving a data packet from a client of said wireless network <u>Structure</u> : The radio modem 62 described in FIGS. 3 and 12, col. 13, ll. 10-17, and col. 18, l. 14 to col. 19, l. 7 of the specification.	Col. 13, ll. 10-17; Col. 18, l. 14 - Col. 19, l. 7 ; Figs. 3, 12 and associated descriptions.	
11.	[a server comprising] means for converting said data packet to a format used in said second network	'516, Claims 6, 7	<u>Function</u> : converting said data packet to a format used in said second network <u>Structure</u> : A communication bridge, router, hub, gateway, or Ethernet interface, and their equivalents	Col. 5, ll. 40-43, 52-66; Col. 7, ll. 64-66; Col. 17, ll. 27-30; Cols. 7, 8, 9 Figure 10		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
12.	[a server comprising] means for sending said data packet to a proper location on said second network	'516, Claims 6, 7	<u>Function</u> : sending said data packet to a proper location on said second network <u>Structure</u> : a network interface and a microprocessor configured to send a data packet and its equivalents	Col. 17, ll. 34-38; Col. 7, ll. 37-61; Cols. 7, 8, 9		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
						clearly linked to the specified function.		
13.	[a server comprising] means for receiving a data packet from said second network	'516, Claims 6, 7	<u>Function</u> : converting said data packet to a format used in said second network <u>Structure</u> : A communication bridge, router, hub, gateway, or Ethernet interface, and their equivalents	Col. 5, ll. 40-43, 52-66; Col. 7, ll. 64-66; Col. 17, ll. 27-30; Cols. 7, 8, 9  Figure 10		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
14.	[a server comprising] means for converting said data packet to a format used in said wireless network	'516, Claims 6, 8	<u>Function</u> : converting said data packet to a format used in said wireless network <u>Structure</u> : A communication bridge, router, hub, gateway, or Ethernet interface, and their equivalents	Col. 5, ll. 40-43, 52-66; Col. 7, ll. 64-66; Col. 17, ll. 27-30; Cols. 7, 8, 9  Figure 10		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
15.	[a server comprising] means for transmitting said data packet with a header to a client of said wireless network	'516, Claims 6, 8, 9	<u>Function</u> : transmitting said data packet with said header to a client of said wireless network <u>Structure</u> : a radio modem and its equivalents	Col. 5, ll. 54-58; Col. 17, ll. 15-42; Col. 18, ll. 32-34; Cols. 7, 8, 9, and 18; Figures 3 and 12 and related description		<u>Function</u> : transmitting a data packet with a header to a client of a wireless network  <u>Structure</u> : The radio modem 62 described in FIGS. 3 and 12, col. 13, ll. 10-17, and col. 18, l. 14 to col. 19,		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
						I. 7 of the specification.		
16.	[a server comprising] means for changing transmission paths of clients to optimize the transmission paths including changing the transmission path from the client to the gateway so that the path to the gateway is chosen from the group consisting essentially of the path to the gateway through the least possible number of additional clients, the path to the gateway through the most robust additional clients, the path to the gateway through the clients with the least amount of traffic, and the path to the gateway through the fastest clients	'516, Claim 6	<u>Function</u> : changing the transmission paths of clients to optimize the transmission paths <u>Structure</u> : a radio modem and a processor, such as a microprocessor configured with logic to change the transmission paths and its equivalents	Col. 5, l. 54 – Col. 6, l. 7; Col. 9, ll. 6-25; Col. 11, ll. 4-38; Col. 12, ll. 5-36; Col. 17, ll. 15-42		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified function.		
17.	[wherein the means for converting the data packet to a format used in a second network is a] means for	'516, Claim 7	<u>Function</u> : converting the data packet to a TCP/IP format if it is destined for an IP address on a TCP/IP protocol network <u>Structure</u> : A communication	Figs. 3, 4, 10 Col. 5, ll. 40-43, 52-66; Col. 7, ll. 64-66; Col. 17, ll. 27-30;		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
	converting the data packet to a TCP/IP format if it is destined for an IP address on a TCP/IP protocol network		bridge, router, hub, gateway, or Ethernet interface, and their equivalents	Cols. 7, 8, 9		to describe any structure, material, or acts that are clearly linked to the specified		
18.	[wherein the means for sending the data packet to a proper location on the second network is a] means for sending the TCP/IP format data packet to the IP address on the TCP/IP protocol network	'516, Claim 7	<u>Function:</u> sending the TCP/IP format data packet to the IP address on the TCP/IP protocol network  <u>Structure:</u> a network interface and a microprocessor configured to send a data packet and its equivalents	Figs. 3, 4, 10  Col. 17, ll. 34-38; Col. 7, ll. 57-61; Cols. 7, 8, 9  Col. 8, ll. 1-5; Col. 14, ll. 9-16; Col. 17, ll. 13-16; Col. 14, ll. 10-14		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified		
19.	network is a] means for receiving a data packet from the TCP/IP protocol network	'516, Claim 7	<u>Function:</u> receiving a data packet from the TCP/IP protocol network  <u>Structure:</u> a network interface and its equivalents	Figs. 3, 4, 10  Cols. 7, 8, 9  Col. 7, ll. 63-65; Col. 8, ll. 1-5; Col. 14, ll. 9-16; Col. 17, ll. 13-16; Col. 14, ll. 10-14		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified		
20.	[wherein the means for converting the data packet to a format used in the wireless network includes] means for adding a header to the packet including a reverse link and a data packet type if the data packet is destined for a client of the wireless network, the reverse link being one of a direct link to the client and an indirect link to the client through one or more other clients of the wireless network	'516, Claims 8, 9	<u>Function:</u> adding a header to the packet including a reverse link and a data packet type if the data packet is destined for a client of the wireless network, the reverse link being one of a direct link to the client and an indirect link to the client through one or more other clients of the wireless network	Figs. 17, element 364; 18a, element 396  Col. 14, ll. 17-27 Col. 20, ll. 60-67 Col. 21, ll. 37-43		This claim term is invalid under 35 U.S.C. § 112, second and sixth paragraphs, as the specification fails to describe any structure, material, or acts that are clearly linked to the specified		

**Exhibit A – Joint Claim Construction Statement**

Alleged means-plus-function Terms								
No.	Term	Patent Number/Claims	IPCO's Preliminary Proposed Construction	Intus IQ's Exemplary Intrinsic Evidence	Intus IQ's Exemplary Extrinsic Evidence	Schneider's Preliminary Proposed Construction	Schneider's Exemplary Intrinsic Evidence	Schneider's Exemplary Extrinsic Evidence
	destined for a client of the wireless network		<u>Structure</u> : a processor, such as a microprocessor, configured with logic for performing the recited function, which may include logic for adding a header to the packet to include a reverse link and a data type when the packet is destined for a client of the wireless network, and its equivalents					